UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PESTICIDE PROGRAMS

August 25, 1999

MEMORANDUM

SUBJECT: Response to Registrant's Error Comments on the Preliminary Risk Assessment for Coumaphos

FROM: Monica B. Alvarez, Chemical Review Manager
Special Review and Reregistration Division (7508C)

TO: Coumaphos Public Docket

The registrant for the organophosphate insecticide coumaphos, Bayer Corporation, submitted comments as requested by the Agency in a letter dated July 9, 1999. Bayer was provided 30 days to review and make comments on mathematical, computational, typographic and similar errors. All of the comments received, except one, were comments other than error corrections. Therefore, the Agency decided to address both the gross error and the other comments after the official 60-day public comment period.

The only error correction made by the registrant is related to the physical state and purity of the coumaphos technical. EPA is aware of this error. Coumaphos technical is a solid material with a purity of 96% and not a liquid with a purity of 93%, as stated in some of the risk assessments. This error has been noted by EPA, and it will be changed in future assessments. This change is not expected to impact the risk assessment.

Other comments made by the registrant, which were outside the scope of "error correction," are related to formulations, products uses, use rates, and risk assessment assumptions. Bayer disagrees with the Agency's inclusion of the wettable powder formulation and sheep and goat uses in the risk assessment, because of the recent submission of a voluntary request to cancel the Co-Ral Animal Insecticide 25% Wettable Powder formulation (EPA Reg. No. 11556-21). While the Agency acknowledges that Bayer has submitted this request recently, the cancellation of the formulation is not yet final. Provided there are no objections by the public, the voluntary cancellation will be final on January 31, 2000, once the official comment period closes. The Agency will revise the risk assessment to delete the wettable powder formulation and the two uses once the cancellation is final. The deletion of this formulation and uses will likely result in lower overall occupational risks.

Bayer also stated that the Agency used incorrect use rates and assumptions in the risk assessments. The Agency is in the process of verifying this information. If changes to the use rates and assumptions used are appropriate, the changes will be made when the Agency revises the preliminary risk assessment subsequent to the 60-day public comment period.